## UNITED STATES BANKRUPTCY COURT EASTRN DISTRICT OF PENNSYLVANIA

IN RE:	Chapter 13
FEJI CHERIAN,	Chapter 13 Case No. 22-10032-amc

WITHDRAWAL OF APPEARANCE OF MICHAEL D. VAGNONI, ESQUIRE AND OBERMAYER REBMANN MAXWELL & HIPPEL LLP AND ENTRY OF APPEARANCE OF MATTHEW G. BRUSHWOOD, ESQUIRE AND BARLEY SNYDER AND REQUEST FOR SERVICE OF PAPERS, RECEIPT OF NOTICES, AND INCLUSION ON NOTICE LIST

## TO THE CLERK OF THE BANKRUPTCY COURT:

PLEASE withdraw the appearance of Michael D. Vagnoni, Esquire of Obermayer Rebmann Maxwell & Hippel LLP in his representation of Prudential Bank in the above-captioned matter.

PLEASE enter the appearance of Matthew G. Brushwood, Esquire of Barley Snyder on behalf of Fulton Bank, N.A., Successor by Merger to Prudential Bank in the above-captioned matter.

PLEASE TAKE NOTICE that the undersigned law firm is counsel for a party in interest in the above-captioned case, and, pursuant to Bankruptcy Rules 2002 and 9007, our client respectfully requests that all notices given or required to be given in this case and in any adversary proceedings by the Court, the Debtor, any Creditors' Committee, any Trustee, the United States Trustee, any Trustee subsequently appointed, and/or any other party in interest in this case be given to the undersigned counsel at the addresses and to the persons, telephone

Case 22-10032-amc Doc 54 Filed 12/29/22 Entered 12/29/22 13:18:37 Desc Mair Document Page 2 of 3

numbers and telecopier set forth below. This request includes, without limitation, all orders, notices, hearing dates, applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers, schedules of assets and liabilities, statement of affairs, operating reports, plans of reorganization, and disclosure statements, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, delivery service, telephone, telegraph, telex, telecopier, or otherwise:

Fulton Bank, N.A., Successor by Merger to Prudential Bank ATTN: Matthew G. Brushwood, Esquire Barley Snyder 50 North Fifth Street, 2nd Floor Reading, PA 19601 Telephone No.: 610-376-6651

Telecopier No.: 610-376-5243 Email: mbrushwood@barley.com

PLEASE TAKE FURTHER NOTICE that client intends that neither this notice of appearance nor any later appearance, pleading, claim or suit shall waive (i) client's rights to have orders in non-core matters entered only after de novo review by a District Judge, (ii) client's right to trial by jury in any proceeding so triable in this case or any other cases, controversies or proceedings related to this case, (iii) client's right to have the District Court withdraw the reference in any matter subject to mandatory or discretional withdrawal, (iv) client's right to have the Bankruptcy Court and the District Court abstain in any matter subject to mandatory or discretionary abstention or (v) any other rights, claims, actions, defenses, set-offs or recoupments

to which client is or may be entitled under agreements or in law or in equity, all of which rights, claims, actions, defenses, set-offs and recoupments client expressly reserves.

Obermayer Rebmann Maxwell & Hippel LLP

Barley Snyder

By: /s/ Michael D. Vagnoni, Esquire
Michael D. Vagnoni, Esquire
Centre Square West, Suite 3400
1500 Market Street
Philadelphia, PA 19102
215-665-3066

By: /s/ Matthew G. Brushwood, Esquire
Matthew G. Brushwood, Esquire
50 North Fifth Street, 2nd Floor
Reading, PA 19601
610-376-6651

We hereby certify that copies of this Withdrawal and Entry of Appearance were served by U.S. First Class Mail, postage prepaid, upon the following entities on the date hereof:

<u>Debtor</u>: Feji Cherian 4 Madison Way Downingtown, PA 19335 Debtor's Attorney: Richard N. Lipow, Esquire 629 Swedesford Road Malvern, PA 19355

<u>Chapter 13 Trustee</u> Kenneth E. West, Esquire 1234 Market Street, Suite 1813 Philadelphia, PA 19107 <u>U.S. Trustee</u>: Office of the U.S. Trustee Robert N.C. Nix Federal Building 900 Market Street, Suite 320 Philadelphia, PA 19107

DATED: December 29, 2022